1		The Honorable James L. Robart
2		
3		
4		
5		
6		
7		
8	UNITED STATES DISTRI WESTERN DISTRICT AT SEAT	OF WASHINGTON
10		
11	UNITED STATES OF AMERICA,	NO. CR19-143JLR
12	Plaintiff,	GOVERNMENT'S AMENDED EXHIBIT
13		LIST
14	v.	
15	VOLODYMYR KVASHUK,	
16	Defendant.	
17	The United States of America, by and throu	igh Brian T. Moran, United States Attorney
18	for the Western District of Washington, and Micha	nel Dion and Siddharth Velamoor, Assistant
19	United States Attorneys, files this Amended Exhib	it List identifying each exhibit that the
20	government may introduce at trial. The Governme	ent reserves the right to supplement, or
21	otherwise revise, the exhibit list with additional ex	hibits as necessary prior to and during trial.
22		
23		
24		
25		
26		
27		
$_{28}$		

1	Exhibit No.	Description
2	100	Screenshots of "Grizzled" Windows Machine
3	100a	Additional screenshot of "Grizzled" Windows Machine
4 5	101	Video capture of "Purchase Test" Program on "Grizzled" Windows Machine
6	102	Screenshots of "Purchase Test" Program on "Grizzled" Windows Machine
7	103	"Purchase Flow" Script
8	104	Screenshots of Ubuntu Machine
9	105	Screenshots of Kali Machine ("Undefined" User)
10	106	Screenshots of Kali Machine ("Root" user)
12	107	Combined Device Firefox Search History
13	108A-108L	Working Notes (Twelve Iterations)
14	109	Screenshots: Purchase of Xbox Gift Card – Digital Codes
15	110	Screenshot: 5x5 Codes
16	111	Screenshot: 5x5 Codes
17 18	112	Screenshot: 5x5 Codes
19	113	Screenshots: Order Number 7645857312
20	114	Screenshots: Blurred Order Number
21	115	Screenshots: Order Number 4217479269
22	116	Screenshots: Order Number 3782972167
23 24	117A-117L	Working Notes of Sfwe2eauto Account Credentials and List of 5x5 Codes Purchased Through Sfwe2eauto Account (Twelve Iterations)
25	118	List of 5x5 Codes
26	119	List of 5x5 Codes
27		
28	120	Spreadsheet of 5x5 Codes

1	121A-C	Spreadsheet of 5x5 Codes (Tabbed by Currency)
2	122	Spreadsheet of 5x5 Codes
3	123	Spreadsheet of 5x5 Codes
5	124	Spreadsheet of 5x5 Codes
6	125	Spreadsheet of 5x5 Codes
7	126	Spreadsheet of 5x5 Codes
8	127	Spreadsheet of 5x5 Codes
9	128	Spreadsheet of 5x5 Codes
10	129	Spreadsheet of 5x5 Codes
11 12	130	Spreadsheet of 5x5 Codes
13	131	Spreadsheet of 5x5 Codes
14	132	Spreadsheet of 5x5 Codes
15	133A-B	Spreadsheet of 5x5 Codes (Tabbed by Currency)
16	134A-B	Spreadsheet of 5x5 Codes (Tabbed by Currency)
17	135A-C	Spreadsheet of 5x5 Codes (Tabbed by Currency)
18 19	136A-C	Spreadsheet of 5x5 Codes (Tabbed by Currency)
20	137A-C	Spreadsheet of 5x5 Codes (Tabbed by Currency)
21	138A-C	Spreadsheet of 5x5 Codes (Tabbed by Currency)
22	139A-C	Spreadsheet of 5x5 Codes (Tabbed by Currency)
23	140A-C	Spreadsheet of 5x5 Codes (Tabbed by Currency)
24	141A-C	Spreadsheet of 5x5 Codes (Tabbed by Currency)
25 26	142A-C	Spreadsheet of 5x5 Codes (Tabbed by Currency)
27	143A-D	Spreadsheet of 5x5 Codes (Tabbed by Currency)
28		
		UNITED STATES ATTORNEY

1	144	Screenshot of Internet Search for Tor/Kali
2	145	"Purchase Test" Assembly Information File
3	146	Text File Containing Recovery Codes for grizzled@protonmail.com Account
4	147	Screenshot of Private Internet Access
5		
6	148	Screenshot of G2A Login Screen
7	149	Private Internet Access program log
8	200	Gmail search warrant response – cover letter and Rule 902 certification
9	200	1/24/19 email from Department of Motor Vehicles to "Grigoriy"
10	202	2/5/19 Lusk/Kvashuk emails
11	203	2/6/19 Lusk/Kvashuk emails
12	204	2/12/19 Lusk/Kvashuk emails
13	205	2/5/19 Lusk/Kvashuk emails
14	206	2/6/19 Lusk/Kvashuk emails
15	207	12/19/17 Pleasant/Kvashuk emails
16	208	12/19/17 Pleasant/Kvashuk emails
17	209	Number not used
18	210	Gmail records accounts linked by SMS
19	211	6/25/18 Verizon email to "Grigory"
20	212	7/26/18 Kvashuk email with attached resume
21	213	2/1/18 Coinbase email notification
22	214	Oleksandr Kvashuk Visa application
23	215	3/1/18 Fidelity email notification
24	216	5/18/18 leongardina@gmail.com email
25	217	4/19/18 Tuesley email with attached rental agreement for Renton house
26 27	218	11/22/17 email re new device confirmation from grizzled@proton
28		
40		UNITED STATES ATTORNEY

1	219	Gmail records subscriber information with IP addresses
2	220	Gmail records – location information – bulk exhibit
3	221	4/6/18 Coinbase notification email
	222	5/28/18 Coinbase notification email
4	223	5/16/18 Wells Fargo notification email
5	224	11/24/17 Guterson-Kvashuk emails
6	225	4/2/18 Wells Fargo email
	226	1/30/18 Coinbase notification email
7	227	4/1/18 Coinbase notification email
8	228	4/12/18 Coinbase notification email
9	229	2/20/17 Coinbase notification email
	230	3/1/18 Coinbase notification email
10	231	2/5/18 Coinbase notification email
11	232	3/15/18 Coinbase notification email
12	233	3/21/18 Coinbase notification email
	234	5/28/18 Coinbase notification email
13	235	5/17/18 Tesla payment confirmation email
14	236	1/30/19 Wells Fargo email
15	237	2/2/18 Wells Fargo email
	238	4/9/18 Wells Fargo email
16	239	4/10/18 Wells Fargo email
17	240	11/30/17 Wells Fargo email
18	241	12/11/17 Wells Fargo email
	242	12/21/17 Wells Fargo email
19	243	2/6/18 Wells Fargo email
$20 \ $	244	3/2/18 Wells Fargo email
$_{21}$	245	3/19/18 Wells Fargo email
	246	4/2/18 Wells Fargo email
22	247	12/29/17 Coinbase notification email
23	248	2/26/18 Tesla notification email
	249	12/7/17 Fidelity Investments notification email
24	250	3/12/18 Coinbase notification email
25	251	3/19/18 Coinbase notification email
26	252	1/26/18 Coinbase notification email
	253	2/1/18 Coinbase notification email
27	254	3/16/18 Coinbase notification email
28	255	3/1/18 Coinbase notification email

1 II	256	Google search history – bulk exhibit
1	256	4/1/18 Coinbase notification email
2	257	
3	300	Microsoft search warrant response – 902 certification
	301	"avestu" email account information
$4 \parallel$	302	"sfwe2" email account information
5	303	"vokvas" email account information
6	304	"zabeerj2" email account information
	305	"safirion" email account information
7	306	2/1/18 11:10 pm "avestu" CSV purchase confirmation email
8	307	2/1/18 11:07 pm "avestu" CSV purchase confirmation email
9	308	2/1/18 11:05 pm "avestu" CSV purchase confirmation email
10	309	2/1/18 11:03 pm "avestu" CSV purchase confirmation email
10	310	2/1/18 11:09 pm "avestu" CSV purchase confirmation email
11	311	2/13/18 9:47 pm "avestu" CSV purchase confirmation email
12	312	2/15/18 8:09 pm "avestu" CSV purchase confirmation email
13	312A	2/15/18 8:12 pm "avestu" CSV purchase confirmation email
$_{14}$	313	2/15/18 8:22 pm "avestu" CSV purchase confirmation email
	314	2/15/18 8:13 pm "avestu" CSV purchase confirmation email
15	315	2/15/18 8:15 pm "avestu" CSV purchase confirmation email
16	316	2/15/18 8:21 pm "avestu" CSV purchase confirmation email
17	317	2/15/18 8:19 pm "avestu" CSV purchase confirmation email
18	318	2/15/18 7:58 pm "avestu" CSV purchase confirmation email
	319	2/15/18 8:18 pm "avestu" CSV purchase confirmation email
19	320	2/15/18 8:16 pm "avestu" CSV purchase confirmation email
20	321	2/15/18 8:10 pm "avestu" CSV purchase confirmation email
$_{21}$	322	3/19/18 13:10 "sfwe2" CSV purchase confirmation email
	323	3/19/18 13:10 "sfwe2" CSV purchase confirmation email
22	324	3/19/18 13:10 "sfwe2" CSV purchase confirmation email
23	325	3/19/18 13:10 "sfwe2" CSV purchase confirmation email
24	326	3/19/18 13:10 "sfwe2" CSV purchase confirmation email
25	327	3/19/18 13:10 "sfwe2" CSV purchase confirmation email
$_{26}$	328	3/19/18 13:10 "sfwe2" CSV purchase confirmation email
	329	3/19/18 13:10 "sfwe2" CSV purchase confirmation email
27	330	3/19/18 13:11 "sfwe2" CSV purchase confirmation email
28		UNITED STATES ATTORNEY

1	331	3/19/18 13:11 "sfwe2" CSV purchase confirmation email
$_{2}\ $	332	3/19/18 13:11 "sfwe2" CSV purchase confirmation email
	333	3/19/18 13:11 "sfwe2" CSV purchase confirmation email
3	334	3/19/18 13:11 "sfwe2" CSV purchase confirmation email
4	335	3/10/18 10:50 pm "sfwe2" CSV purchase confirmation email
5	336	3/10/18 10:42 pm "sfwe2" CSV purchase confirmation email
6	337	3/10/18 10:47 pm "sfwe2" CSV purchase confirmation email
	338	3/10/18 10:49 pm "sfwe2" CSV purchase confirmation email
7	339	3/10/18 10:52 pm "sfwe2" CSV purchase confirmation email
8	340	3/10/18 10:45 pm "sfwe2" CSV purchase confirmation email
9	341	3/10/18 10:44 pm "sfwe2" CSV purchase confirmation email
	342	3/10/18 10:53 pm "sfwe2" CSV purchase confirmation email
$0 \parallel$	343	12/12/17 11:10 pm "sfwe2" CSV purchase confirmation email
.1	344	12/13/17 3:30 pm "sfwe2" CSV purchase confirmation email
$_{2}$	345	12/13/17 4:43 pm "sfwe2" CSV purchase confirmation email
3	346	12/13/17 3:30 pm "sfwe2" CSV purchase confirmation email
	347	12/14/17 8:02 am "sfwe2" CSV purchase confirmation email
4	348	"vokvas" email account information
5	349	"vokvas" email account creation date
6	350	4/28/17 11:43 "vokvas" account CSV purchase confirmation email
	351	5/30/17 14:19 "vokvas" account CSV purchase confirmation email
.7	352	7/10/17 13:58 "vokvas" account CSV purchase confirmation email
8	353	7/10/17 14:01 "vokvas" account CSV purchase confirmation email
9	354	8/8/17 10:41 "vokvas" account CSV purchase confirmation email
	355	9/11/17 14:44 "vokvas" account CSV purchase confirmation email
00	356	9/11/17 14:59 "vokvas" account CSV purchase confirmation email
21	357	10/3/17 21:53 "vokvas" account CSV purchase confirmation email
22	358	10/4/17 04:55 "vokvas" account CSV purchase confirmation email
	359	10/21/17 19:56 "vokvas" account CSV purchase confirmation email
23	360	10/21/17 7:56 pm "vokvas" account CSV purchase confirmation email
24	361	Microsoft Rule 902 Certification
25	362	Microsoft Token Hash Conversions
26	363	Microsoft Rule 902 Certification
	364	"Safirion" email account mailbox creation date
27	365	Prince-Palmer initial report
$28 \parallel$		·

1	366	Prince-Palmer supplemental report
$_{2}\Vert$	367	Number not used
	368	File for Law Enforcement_4.35.246.19 Logins
3	369	File for Law Enforcement_50.243.108.211 Logins
4	370	File for Law Enforcement_73.53.57.220 Logins
5	371	File for Law Enforcement_All Investigation Accounts Logins
6	372	File for Law Enforcement_Test Account All Tokens
7	373	File for Law Enforcement_Test Account Token Purchases
$_8\ $	374	File for Law Enforcement_Test Account Token Redemptions
9	375	File for Law Enforcement_v-vokvas Test Account Tokens
10	376	File for law enforcment v-vokvas Token Purchases
11	377	File for law enforcment v-vokvas Token Redemptions
12	378	File for Law Enforcment_Device Links Between Accounts
13	379	902 cert for Ex 380, 381
	380	Activity log for IP 4.35.246.19
14	381	Activity log for IP 73-53-57-220.xlsx
15	382	Microsoft Rule 902 certification
16	383	"walter.kv" email account mailbox.creation.date
17	384	Pikimajado account info and transactional records
	385	Business records certification from response to MJ19-319
18	386	admin@searchdom.io account records
19	387	leongardiana@outlook.com account records
20	388	safirion@outlook.com account records
21	389	xidijenizo@axsup.net account records
22	390	Mailbox creation date for admin@searchdom.io
23	391	Transactional history for safirion@outlook.com
	392	Transactional history for xidijenizo@axsup.net
24	394	Business records certification from response to MJ19-346
25	395	Mailbox creation date for xidijenizo@axsup.net
26	396	Microsoft server location declaration
27	397	Microsoft server location declaration 2nd
	398	TIP card request form
28	400	Wells Fargo account -5789 statements for 7/16-8/18

1	400A	Wells Fargo account -5789 checks/debits – first set
$_{2}\Vert$	400B	Wells Fargo 902 certification
3	401	Wells Fargo account -5789 deposits/offsets – first set
	402	Wells Fargo account -5789 statements for 7/18-12/18
4	403	Wells Fargo account -5789 signature cards
5	404	Wells Fargo Rule 902 certification
6	405	Wells Fargo account -5789 checks/debits – second set
7	406	Wells Fargo account -5789 deposits/offsets – second set
	407	Wells Fargo account -5789 signature cards – second set
8	408	Wells Fargo account -5789 statements for 12/18-5/19
9	409	Wells Fargo Rule 902 certification
10	410	Fidelity Rule 902 certification
	411	Fidelity account records – bulk exhibit
11	500	Kvashuk 2017 certified federal income tax return
12	500A	Kvashuk 2017 certified federal income tax return transcript
13	501	Kvashuk 2018 certified federal income tax return
	501A	Kvashuk 2018 certified federal income tax return transcript
14	501B	Tax Rite E-File Authorization
15	502	Kvashuk 2018 tax materials UMB bank document
16	503	Kvashuk 2018 tax materials Sinclair W-2
	504	Kvashuk 2018 tax materials driver's license
17	505	Kvashuk 2018 tax materials Resource Management W-2
18	506	Kvashuk 2018 tax return materials Form 3520
19	506A	Kvashuk 2018 tax return materials Form 3520
	507	Kvashuk 2018 tax return materials records provided by Kvashuk to Lusk
20	508	Kvashuk 2018 tax return materials Microsoft W-2
21	509	Lusk-Kvashuk electronic communications
22	510	Lusk-Kvashuk electronic communications tax preparation services agreement
	511	Lusk-Kvashuk electronic communications tax organizer
23	512	Tax Rite Rule 902 Certification
24	513	Shipley Schedule One – first worksheet
25	514	Shipley Schedule One – second worksheet
25	515	Shipley Schedule Two – third worksheet
26	516	Shipley Schedule Two – second worksheet
27	600	Tesla purchase records Tesla Pula 002 certification
	601	Tesla Rule 902 certification Reinier Title Records 2/21/18 Durchese and Sele Agreement
28	602	Rainier Title Records 3/31/18 Purchase and Sale Agreement

1	603	Rainier Title Records 5/24/18 Warranty Deed
$2 \parallel$	604	Rainier Title Records – Rule 902 certification
	605	Photo of Renton house exterior view
3	700	Coinbase records for volodymyr@gmail
4	701	Coinbase records for walterkv.outlook.com
5	702	Coinbase records for gorgonaz@outlook.com
	703	Coinbase Rule 902 certification
6	704	Coinbase records - Kvashuk photo
7	705	Coinbase records – Kvashuk driver's license
$_8\ $	706	Poloniex Rule 902 certification
	707	Poloniex records Account Holder Information
9	708	Poloniex records KYC
10	709	Poloniex records IPs
11	710	Poloniex records Logins
	711	Poloniex records Deposits
12	712	Poloniex records Withdrawals
13	713	Poloniex records Trades
$_{14}$	714	Poloniex records Communication
	900	Recording of Kvashuk interview - 5/10/18 - part 1
15	900A	Transcript of 900
16	901	Recording of Kvashuk interview - 5/10/18 - part 2
$_{17}\ $	901A	Transcript of 901
	902	Recording of Kvashuk interview - 5/10/18 - part 3
18	902A	Transcript of 902
19	903	Recording of Kvashuk interview - 5/16/18
$20 \ $	903A	Transcript of 903
$_{21}$	904	Number not used
	1000	Paxful records user report
22	1001	Paxful records server information
23	1002	Paxful records Trade Chats 1
24	1003	Paxful records Trade Chats 2
24	1004	Paxful records Trade Chats 3
25	1005	Paxful records Trade Chats 4
$_{26}$	1006	Paxful records Trade Chats 5
	1007	Paxful records Trade Chats 6
27	1008	Paxful Rule 902 certification
28	1100	Summary of Purchases Made by v-vokvas Account

1	1101	Summary of Purchases Made by avestu Account
$_{2}\parallel$	1102	Summary of Purchases Made by sfwe2eauto Account
	1103	Summary of Purchases Made by zabeerj2 Account
3	1104	Summary of Combined Purchases Made by Test Accounts
4	1105	Demonstrative Timeline Regarding Xidijenizo Redemption
5	1106	Summary Regarding Paxful Transactions
	1107	Blockchain Transaction Information
6	1108	Summary of Coinbase Transactions
7	1109	Combined CSV Purchase, Paxful Sales, and Coinbase Transactions
$_{8}\ $	1110	Summary Chart Regarding Count 11 Monetary Transaction
	1111	Summary Chart Regarding Count 12 through 14 Monetary Transactions
9	1112	Summary Chart Regarding Count 15-16 Monetary Transactions
10	1113	Summary of Test Accounts Use While Unemployed
11	1114	Number not used
11	1115	Number not used
12	1116	Chart of Location Data
13	1117	Number not used
	1118	Demonstrative Regarding Blockchain
14	1119	Number not used
15	1120	Number not used
16	1121	Second demonstrative Regarding Blockchain
	1122	Number not used
17	1123	Number not used
18	1200	Photos from search warrant execution
19	1201	Graphics card
	1202	Microsoft ID
20	1203	HP laptop computer
21	1204	Happy Colours notebook
22	1204A	Happy Colours notebook – photos of selected pages
	1205	Handwritten note regarding disposition of \$10 million (hardcopy seized exhibit)
23	1205A	Handwritten note regarding disposition of \$10 million (photograph of seized
24		exhibit)
25	1205B	Handwritten note regarding disposition of \$10 million (English translation)
	1206	Photos taken by forensics team
26	1207	SearchDom folder with stock repurchase agreement
27	1208	6/22/18 Microsoft Termination Letter
28	1209	Envelope from Tax Rite with Form 3520 for 2018 tax year
- 11		

1	1300	SearchDom business information
$_{2}\Vert$	1301	Photographs of Bitcoin Mining Apparatus
3	1302	Form 9325 Acknowledgement and General Information for Taxpayers Who File Returns Electronically For Tax Year 2016
4	1303	Photograph of Kvashuk Washington State Driver License
5	1304 1305	Photograph of Form W-2 for Tax Year 2018 Photograph of Form W-2 for Tax Year 2018
6	1306	Photograph of Form 1099-SA for Tax Year 2018
7	1307	Photograph of Form 1099-SA for Tax Year 2018
	1308	Photograph of Form W-2 for Tax Year 2018
8	1309	2016 Federal Income Tax Return
9	1310	Form 9325 Acknowledgement and General Information for Taxpayers Who File Returns Electronically For Tax Year 2017
10	1311	2017 Federal Income Tax Return
11	1312	TaxRite Income Tax Organizer (2018)
11	1313	Tax Hotline Services Agreement (2018)
12	1314	Instructions from TaxRite Regarding Materials Required for Preparation of Tax
13		Return
	1315	Lease and Lease Extension For Norman Arms Apartments
14	1316	Coinbase Tax Report
15	1317	Coinbase Tax Report
	1318	Coinbase Tax Report
16	1319	Loan Questionnaire
17	1320	Coinbase Tax Report
1 /	1321	Photograph of Kvashuk Washington Driver License
18	1322	Photograph of Kvashuk at Flight Simulator
19	1323	Photograph of National University of Ostroh Academy Document
19	1324 1325	Photograph of National University of Ostroh Academy Document
20	1326	Photograph of Contractor Letter to Kvashuk Digital File Containing Signature
21	1327	Digital File Containing Signature Digital File Containing Signature
41	1328	Photograph of Bachelor Diploma
22	1329	Electronic Receipt from Uber
23	1330	Photograph of Kvashuk
23	1331	Reimbursement Spreadsheet For Interview in Boston
24	1332A-G	Photographs of Norman Arms Apartment Facility
25	1400	Verizon Wireless Rule 902 certification
	1401	Verizon Wireless IP login records
26	1401A	Verizon records Natting IP explanation
27	1401B	Verizon records Natting IP explanation additional
28	1402	Verizon Wireless Rule 902 certification

1403	Verizon Wireless subscriber information
1404	London Trust Media records
1404a	Private Internet Access records
1404b	902 certifications for London Trust Media & Private Internet Access
1405	FedEx Records
1405A	FedEx Certification of Business Records
1406	Microsoft employment records for Kvashuk
1406A	902 certification for Microsoft employment records for Kvashuk

7 8

DATED this 17th day of February, 2020.

9 10

Respectfully submitted,

1112

BRIAN T. MORAN
United States Attorney

13

/s/ Michael Dion

1415

MICHAEL DION SIDDHARTH VELAMOOR

16

Assistant United States Attorneys 700 Stewart Street, Suite 5220

17

Seattle, WA 98101-1271 Telephone: (206) 553-7729

18

Fax: (206) 553-0882 E-mail:Michael.Dion@usdoj.gov

19

20

21

22

23

2425

26

27

28

1 **CERTIFICATE OF SERVICE** I hereby certify that on February 17, 2020, I electronically filed the foregoing with the 2 Clerk of the Court using the CM/ECF system, which will send notification of such filing to the 3 attorney(s) of record for the defendant. 4 5 /s/ Elizabeth Gan 6 **ELIZABETH GAN** LEGAL ASSISTANT 7 United States Attorney's Office 8 700 Stewart Street, Suite 5220 Seattle, Washington 98101-1271 9 Phone: (206) 553-4370 Fax: (206) 553-0882 10 Email: Elizabeth.Gan@usdoj.gov 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 UNITED STATES ATTORNEY